

PERKINS COIE LLP

607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011

TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

JUDITH L. CORLEY
(202) 434-1622

May 20, 1999

Michael Lehmann
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 20 4 05 PM '99

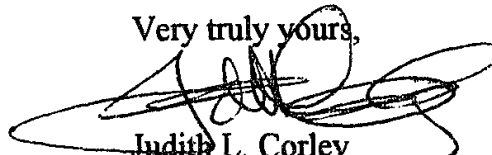
Re: MUR 4759

Dear Mr. Lehmann:

Please find enclosed the signed originals of the Responses to Interrogatories and Requests for Production of Documents for Friends of Phil Maloof, and Dolores Gonzales, as treasurer, and Supporters of Phil Maloof, and Theresa Keaveny, as Treasurer.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,


Judith L. Corley
Counsel to Respondents

enclosure

[00000-0000/DA991400.028]

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Phil Maloof and
Dolores Gonzales, as treasurer

)
) MUR 4759
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MAY 20 4 05 PM '99

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

**RESPONSE TO INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

INTERROGATORY NO. 1

Concerning the fliers that accompanied the absentee ballot requests sent to potential voters in May 1998 -- Complainant's Attachment #2:

- (a) state the total cost, if any, to Friends of Phil Maloof to produce and distribute the fliers;
- (b) state the total number of fliers mailed to potential voters; and
- (c) produce all documents evidencing the total cost and distribution of the fliers.

RESPONSE

- (a) None
- (b) None
- (c) None

INTERROGATORY NO. 2

Concerning the four-by-eight foot billboards and yard signs -- Complainant's Attachment #3:

- (a) state the total cost, if any, to Friends of Phil Maloof to produce and post the billboards and yard signs;

- (b) state the total number of billboards and yard signs created;
- (c) state the total number of billboards and yard signs distributed; and
- (d) produce all documents evidencing the total cost and posting of the billboards and yard signs.

RESPONSE

- (a) \$885 (1/2 of total)
- (b) 15 (1/2 of total)
- (c) The signs were handed out to volunteers to distribute in neighborhoods around the district. The Committee does not have specific records of how many of the signs were distributed, but believes that all 15 were.
- (d) See Attachment A.

INTERROGATORY NO. 3

Concerning the invitations to the June 17, 1998 fundraiser -- Complainant's Attachment #5:

- (a) state the total cost, if any, to Friends of Phil Maloof to produce and distribute the fundraiser invitations;
- (b) state the total number of fundraiser invitations mailed; and
- (c) produce all documents evidencing the total cost and distribution of the fundraiser invitations.


RESPONSE

- (a) None

(b) None

(c) None

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct. Executed this 18 day of May, 1999.


Friends of Phil Maloof
Dolores Gonzalez, as Treasurer

MAY 20 4 06 PM '99

In the Matter of

Supporters of Phil Maloof and
Theresa Keaveny, as treasurer

)
) MUR 4759
)

**RESPONSE TO INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

INTERROGATORY NO. 1

Concerning the fliers that accompanied the absentee ballot requests sent to potential voters in May 1998 -- Complainant's Attachment #2:

- (a) state the total cost, if any, to Supporters of Phil Maloof to produce and distribute the fliers;
- (b) state the total number of fliers mailed to potential voters; and
- (c) produce all documents evidencing the total cost and distribution of the fliers.

RESPONSE

- (a) \$42,079.90.
- (b) 120,000 mailers were produced. 108,000 were mailed.
- (c) See Attachment C.

INTERROGATORY NO. 2

Concerning the four-by-eight foot billboards and yard signs -- Complainant's Attachment #3:

- (a) state the total cost, if any, to Supporters of Phil Maloof to produce and post the billboards and yard signs;
- (b) state the total number of billboards and yard signs created;
- (c) state the total number of billboards and yard signs distributed; and

- (d) produce all documents evidencing the total cost and posting of the billboards and yard signs.

RESPONSE

- (a) \$885 (1/2 of total)
- (b) 15 (1/2 of total)
- (c) The signs were handed out to volunteers to distribute in neighborhoods around the district. The Committee does not have specific records of how many of the signs were distributed, but believes that all 15 were.
- (d) See Attachment A.

INTERROGATORY NO. 3

Concerning the invitations to the June 17, 1998 fundraiser -- Complainant's Attachment #5:

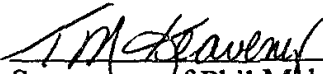
- (a) state the total cost, if any, to Supporters of Phil Maloof to produce and distribute the fundraiser invitations;
- (b) state the total number of fundraiser invitations mailed; and
- (c) produce all documents evidencing the total cost and distribution of the fundraiser invitations.

RESPONSE

- (a) Estimated cost: \$1,618.33. This includes printing costs of \$658.33. The Committee does not have a separate invoice for the printing of this invitation, but has an entry in its database for the payment of printing at around the time the invitation would have been printed. Based on the number and size of the invitation, and the typical costs of similar invitations (approximately \$.30 per invitation), the Committee believes this is the amount paid for the invitation. The invitation was mailed by volunteers at the campaign headquarters. There are, therefore, no specific costs associated with the mailing of the invitation. The Committee has included in the estimate above the cost of 3,000 stamps at \$.32 each (\$960).
- (b) Approximately 3,000 produced. The Committee believes that all 3,000 were distributed.

(c) See Attachment B.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct.
Executed this 18 day of May, 1999.


Supporters of Phil Maloof
Theresa Keaveny, as Treasurer

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ATTACHMENT A

DUT —
Supporters
of Phil Maloof

A - Sign - Ment - For - You
514 Marble Avenue N. W.
Albuquerque New Mexico
Call 480-1841
Office 2449617

Jerome Montoya

TO: Committee to Elect Phil Maloof
c/o treasurer

DATE: April 23, 1998

Signs: 30 4/8s'

Type: **Corta Plus**

Color: Blue, yellow and red.

Cost.....	30 4/8 @ 59.00	\$1,770.00
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Deposit.....\$895.00

Balance due	\$805.00
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Please make check payable to Jerome Montoya

Jerome Montoya

3 @ 59.00 \$1,770.00

890 #

PD 1/10-47

..... \$895.00

PD

890 #

..... ~~\$895.00~~

PD

890 #

PD

4-24-98

112

PM

ATTACHMENT B

Run Date : 04/28/99
User Name: GUEST

Disbursement Transaction List

ON 1129

Page 1

Vendor No.	Name	Date	Period	Code	Purpose	Amount
	Lithocol.	05/12/99	Special	Operating Expenditure N	Letterhead	2542.67
	Lithocol.	05/13/99	Special	Operating Expenditure N	Printing	3159.42
	Lithocol.	06/08/99	Special	Operating Expenditure N	Printing	7098.70
	Lithocol.	06/18/99	Special	Operating Expenditure N	Printing	2218.04
	Lithocol.	06/19/99	Special	Operating Expenditure N	Office Supplies	224.32
	Lithocol.	06/22/99	Special	Operating Expenditure N	Stationery	1463.82
	Lithocol.	06/24/99	Special	Operating Expenditure N	Printing	658.33
Record Total						\$17332.90

Page Total \$17332.90

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ATTACHMENT C

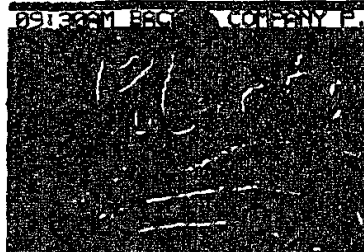
APR 28 '99

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COMPANY P.C.

P.8/13

Graphic
Design
for
Winning
Campaigns



1208 Longwood
4341 South Fremont Avenue
Los Angeles, CA 90019-1725
phone. 213/931.8236
fax. 213/931.2404
e-mail. polartags@aol.com

INVOICE

#0289

date: May 19, 1998

ID number:

client: PHU Molest. for CONSTEAL

1319 San Pedro N.E.
Albuquerque, NM 87110

job description

amount billed

AV Mailer, 11 x 14" four color, two sided

Design, scan, Layout

\$500.00

Color Film output (8 plates)
Messenger to printer

149.90

80.00

total: \$799.90

due upon receipt of invoice

please make check payable to: pol-arts

thank you!

PD 6-6-97
ck #307
Received by agent
6-6-98

2595 "655" 40 "02

MORRIS & CARRICK

INVOICE

TO: Supporters of Phil Malcof

FOR: Absent Ballot Mailer, 3 colors, 1 version, 8.5" x 14" two-fold,
with perf, 120,000 Pieces; Mechanical, Printing, & Delivery

DATE: June 3, 1998

AMOUNT: \$29,450

Received 6-6-98

*pd 6-6-98
CHT 308*

431 PARK AVENUE SOUTH, NEW YORK, NEW YORK 10014 (212) 696-9101
3109 BEACHWOOD DRIVE, LOS ANGELES, CALIFORNIA 90048 (213) 469-1592

05/20/1998 14:16

212931484

SUE BURNSIDE & ASSOC.

PAGE 01

05/20/98 14:38

AMS RESPONSE + 212931484



Postage Request

NO: 7400

Date: May 20, 1998

To: Sue Burnside
Burnside & Associates
1811 E. Tennessee
Los Angeles, CA 90019

To: AMS Response
16168 Quady Ave.
Paramount, CA 90765
Attn: Manny Jurado

SALSPERSON	CNR	DUE DATE	AMS JOB #	DESCRIPTION
Steve Hill	Manny Jurado	05/31/98	00017	Malware

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
100,000	Carrier-Santa Basia	0.180	\$18,000.00
	Need postage 45-hrs prior to mail date.		

TOTAL POSTAGE DUE: \$18,480.00

+1,480.00

\$17,830.00

Make all checks payable to AMS Response.

If you have any questions concerning this invoice, call: Manny Jurado at (800) 634-0494

THANK YOU FOR YOUR BUSINESS

Sean

Postage Fed Ex AMS

TD ch# 202
5-21-98

415019.56240.00